

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PROFESSOR JOHN C. BONNELL
and NANCY L. BONNELL,

Plaintiffs,

vs.

Case No. 99-71155

HONORABLE PAUL D. BORMAN

ALBERT LORENZO, Individually and in his
Representative Capacity as President of Macomb
Community College; WILLIAM MACQUEEN,
Individually and in his Representative Capacity
as Vice President for Human Resources of Macomb
Community College; GUS J. DEMAS, Individually
and in his Representative Capacity as Dean of Arts
and Sciences for Macomb Community College; and
MARK COUSENS, Individually and in his
Representative Capacity as the Attorney for the
Macomb Community College Faculty Organization,

Defendants.

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JAMES C. HOWARTH (P15179)
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NOTICE OF HEARING

TO ALL COUNSEL OF RECORD:

U.S. DIST. COURT
EAST DIST. MICH.
DETROIT
00 JUL 26 AM 12:23

PLEASE TAKE NOTICE that the attached Motion to Stay Proceedings, filed by the Plaintiff, will be brought on for hearing before the Honorable Paul D. Borman, on a date and time to be set by the Court.

Respectfully submitted,



JUAN A. MATEO (P33156)
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Dated: July 22, 2000

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U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION
DETROIT, MI 48226
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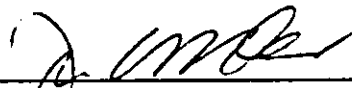
MOTION TO STAY PROCEEDINGS

Plaintiffs, by and through their counsel, Juan A. Mateo and James C. Howarth, hereby move for an order staying proceedings pending decision of the United States Court of Appeals on case number 99-2047.

1. Plaintiffs filed this civil rights complaint in March, 1999.
2. The Court in August, 1999, granted to Plaintiff injunctive relief.
3. That ruling, which goes to the heart of this case, has been on appeal in the United States Court of Appeals. On February 4, 2000, the parties presented oral arguments to the United States Court of Appeals.
4. No decision has been rendered by the Court of Appeals.
5. The Court of Appeals decision would have a tremendous impact on the litigation of this case. Certainly, the Court's decision regarding the First Amendment analysis would directly effect the discovery process.
6. There has been very little discovery during the pendency of the appeal in hopes that the parties would obtain a decision from the Sixth Circuit.
7. At this point in time, the depositions of two parties are scheduled for the month of August.
8. It only makes common sense this Court stay any further proceedings in this action pending the decision from the Sixth Circuit Court of Appeals.
9. Concurrence of this relief has been requested of the defense on many occasions but has been denied.

WHEREFORE, for all of the above reasons, it has been respectfully requested this Court stay proceedings pending the decision of the appeal by the United States Court of Appeals for the Sixth Circuit.

Respectfully submitted,



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Dated: July 22, 2000

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FILED
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U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

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MEMORANDUM IN SUPPORT OF MOTION TO STAY PROCEEDINGS

This Court has discretion pursuant to Rule 16 of the Federal Rules of Civil Procedure governing the scheduling and management of cases to stay this matter. Furthermore, pursuant to

